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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 3:07-cv-5944-JST
MDL No. 1917

This Document Relates to:

All Indirect Purchaser Actions

CLASS ACTION

**DECLARATION OF THERESA D.
MOORE IN SUPPORT OF
OBJECTIONS TO D.E. 4351 REPORT
AND RECOMMENDATION OF
SPECIAL MASTER RE MOTIONS (1)
TO APPROVE INDIRECT
PURCHASER PLAINTIFFS'
SETTLEMENTS WITH THE
PHILLIPS, PANASONIC, HITACHI,
TOSHIBA, SAMSUNG SDI,
TECHNICOLOR AND
TECHNOLOGIES DISPLAYS
AMERICAS DEFENDANTS, AND (2)
FOR AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION
EXPENSES, AND INCENTIVE
AWARDS TO CLASS
REPRESENTATIVES BY OBJECTOR
ROCKHURST UNIVERSITY,
OBJECTOR GARY TALEWSKY, AND
OBJECTOR HARRY GARAVANIAN**

Judge: Honorable John S. Tigar
Courtroom 9-19th Floor
Special Master: Martin Quinn, JAMS

1 I, Theresa D. Moore, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California. I am Counsel
3 for Objectors Rockhurst University, Gary Talewksy, and Harry Garavanian. I make this
4 declaration based on my personal knowledge and my best recollection, and, if called to testify
5 as a witness in this matter, I could and would competently testify to the facts contained herein

6 2. I make this declaration in support of Objections To Docket Entry 4351 Report
7 And Recommendation Of Special Master Re Motions (1) To Approve Indirect Purchaser
8 Plaintiffs' Settlements With The Phillips, Panasonic, Hitachi, Toshiba, Samsung Sdi,
9 Technicolor And Technologies Displays Americas Defendants, And (2) For Award Of
10 Attorneys' Fees, Reimbursement Of Litigation Expenses, And Incentive Awards To Class
11 Representatives By Objector Rockhurst University, Objector Gary Talewsky, And Objector
12 Harry Garavanian

13 3. Attached hereto as **Exhibit A** is a true and correct copy of the Docket Number
14 768 of this case, In Re Cathode Ray Tube (CRT) Antitrust Litigation Case No. 3:07-cv-5944,
15 MDL 1917 that I downloaded from the ECF court filing website prior to October 8, 2015.

16 4. Attached hereto as **Exhibit B** is a true and correct copy of the Docket Number
17 796 of this case, In Re Cathode Ray Tube (CRT) Antitrust Litigation Case No. 3:07-cv-5944,
18 MDL 1917 that I downloaded from the ECF court filing website prior to October 8, 2015. It
19 contains only Judge Conti's filing initials, and was under the heading for Docket Entry 796,
20 "Stipulation and Proposed Order". It contains both the signatures of Special Master Legge and
21 Judge Conti.

22 5. Attached hereto as **Exhibit C** is a true and correct copy of the Docket Number
23 796 of this case, In Re Cathode Ray Tube (CRT) Antitrust Litigation Case No. 3:07-cv-5944,
24 MDL 1917 that I downloaded from the ECF court filing website in February 2016. It contains
25 only Judge Tiger's filing initials, has no Judge's signature, and differs from the document that
26 was in its place and that I downloaded prior to October 8, 2015.

1 6. Attached hereto as **Exhibit D** is a true and correct copy of the Docket Number
2 797 of this case, In Re Cathode Ray Tube (CRT) Antitrust Litigation Case No. 3:07-cv-5944,
3 MDL 1917 that I downloaded from the ECF court filing website in February 2016. It contains
4 the filing initials of Judge Conti and Judge Tiger, and also the Docket Number 796 and differs
5 from the document that was there prior to October 8, 2015.

6 7. Attached hereto as **Exhibit E** is a true and correct copy of the Docket Number
7 799 of this case, In Re Cathode Ray Tube (CRT) Antitrust Litigation Case No. 3:07-cv-5944,
8 MDL 1917 that I downloaded from the ECF court filing website in February 2016. It contains
9 Judge Conti's initials and Judge Tiger's initials. It contains both the signatures of Special
10 Master Legge and Judge Conti and is different than the document that was in its place prior to
11 October 8, 2015. It also contains a document number of 796.

12 8. Attached hereto as **Exhibit F** is a true and correct copy of a screen shot of the
13 home page of the Chunghwa Picture Tube (CPT) CRT Settlement Notice website as it existed
14 on 11.1.11 and was downloaded by me on 02.09.16 from the Internet Archive website
15 <http://archive.org/web/>

16 9. Attached hereto as **Exhibit G** is a true and correct copy of a screen shot of the
17 home page of the LG Picture Tube CRT Settlement Notice website as it existed on 10.16.14 and
18 was by me downloaded on 02.12.16 from the Internet Archive website <http://archive.org/web/>

19 10. I am informed and believe that The Internet Archive referred to in above ¶8 and
20 ¶9 is an organization which documents and saves for historic purposes websites as they existed
21 on a particular dates in the past. The [Internet Archive](#), a 501(c)(3) non-profit, building a digital
22 library of Internet sites and other cultural artifacts in digital form.

23 11. I acted as a co-lead counsel in In Re TFT-LCD (Flat-Panel) Antitrust Litigation
24 USDC NDCA 3:07-md-01827, which involved a price fixing conspiracy of flat panel glass for
25 computers and television, and to which CRT was the precursor conspiracy. I have been closely
26 involved in all aspects of the TFT-LCD litigation including the administration and distribution
27 of the \$1.1 Billion settlement. A review of distribution records in that matter and consultation
28

1 with the court appointed settlement administrator and with the three largest claims aggregators
2 reflect that the distribution to the Indirect Purchase Repealer States of Massachusetts and
3 Missouri was over \$41 million, and was \$340 thousand to the State of Maine.

4 12. Attached hereto as **Exhibit H** is a true and correct copy of an excerpt of
5 transcript from the hearing with the Special Master on January 5, 2016.

6 13. Attached hereto as **Exhibit I** is a true and correct copy of this Objectors
7 Objection and Declaration filed on October 8, 2015.

8 14. Attached hereto as **Exhibit J** is a true and correct copy of this Objectors Reply
9 Objection and Declaration filed on December 9, 2015 on JAMS CaseAnywhere filing system.

10
11 I declare under penalty of perjury that the foregoing is true and correct. Executed this
12 12th day of February, 2016.

13 /s/ Theresa D. Moore
14 Theresa D. Moore